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Attorneys for Defendant
**THE PRUDENTIAL INSURANCE COMPANY OF
AMERICA**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

LISA GALLEGOS,)	Case No. 16-cv-01268-BLF
)	
Plaintiff,)	STIPULATION TO CONTINUE THE
)	DATE FOR SUBMISSION OF
vs.)	[PROPOSED] JUDGMENT AND
)	MOTION FOR ATTORNEYS' FEES BY
THE PRUDENTIAL INSURANCE COMPANY)	7 DAYS
OF AMERICA; and DOES 1-20, inclusive,)	
)	
Defendants.)	

Plaintiff LISA GALLEGOS (“Plaintiff”) and Defendant THE PRUDENTIAL INSURANCE COMPANY OF AMERICA (“Prudential”), by and through their respective counsel of record, hereby stipulate and agree to the following:

WHEREAS, pursuant to the Court’s June 5, 2017 Order Granting in Part Plaintiff’s Motion for Judgment Under Rule 52; Issuing Findings of Fact and Conclusions of Law Under Rule 52, and Denying Defendant’s Motion for Judgment Under Rule 52, (“Order”) (Doc. No. 50), the Court directed the parties to submit a Proposed Judgment within thirty (30) days from the date of the Order and further ordered that any motion for attorneys’ fees be filed that same date;

WHEREAS, pursuant to the Court's Order, the parties met and conferred and agreed that \$92,797.89 is the appropriate amount of benefits due under the Regular Occupation Definition of

1 Disability, which covers the period of April 12, 2015 to March 14, 2017, in addition to any
2 prejudgment interest to be included in the Proposed Judgment;

3 WHEREAS, the parties are continuing meeting and conferring regarding the amount or rate
4 of prejudgment interest to be included in the Proposed Judgment;

5 WHEREAS, Plaintiff has provided Prudential documentation supporting her attorneys' fees
6 and costs, and the parties are continuing meeting and conferring regarding attorneys' fees and costs
7 pursuant to Local Rule 54-5;

8 WHEREAS, given the upcoming 4th of July holiday, Prudential's representative is on a
9 pre-planned vacation until July 5, 2017;

10 NOW THEREFORE, the parties hereby stipulate and agree, subject to the Court's approval
11 that the date for submission of the Proposed Judgment be briefly continued by seven (7) days, until
12 July 12, 2017, and that Plaintiff's Motion for Attorneys' Fees be filed on that same date, July 12,
13 2017.

14 **IT IS SO STIPULATED.**

15 Dated: June 28, 2017

Terrence J. Coleman
Michael J. Quirk
PILLSBURY & COLEMAN, LLP

17 By: /s/ Michael J. Quirk
18 Michael J. Quirk
19 Attorneys for Plaintiff
LISA GALLEGOS

20 Dated: June 28, 2017

Linda M. Lawson
Jason A. James
Sevana Babooian
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23 By: /s/ Sevana Babooian
24 Sevana Babooian
25 Attorneys for Defendant
THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA

26 **FILER'S ATTESTATION**

27 The filing attorney attests that she has obtained concurrence regarding the filing of this
28 document and its content from the signatories to this document.